

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 1:18-CR-00120
v.	§	
	§	
JESSE WILZE TILLMAN	§	

**ELEMENTS OF THE OFFENSE**

You are charged in Count One of the information with violating 18 U.S.C. § 2252(a)(4)(B), and 18 U.S.C. 2252(b)(2), possession of material involving the sexual exploitation of minors. The essential elements which must be proven to establish a violation of this offense are as follows.

1. The Defendant knowingly possessed one or more matters which contained any visual depiction of a minor engaged in sexually explicit conduct; and
2. Such visual depiction had been mailed, shipped, or transported in interstate or foreign commerce, by any means, including by computer, or was produced using materials which had been so mailed, shipped, or transported; and
3. That the production the visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct; and
4. The Defendant knew that the visual depiction involved the use of a minor engaging in sexually explicit conduct.

Respectfully submitted,

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

/s/ Christopher Tortorice  
CHRISTOPHER TORTORICE  
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### **CERTIFICATE OF SERVICE**

I certify that the foregoing instrument was served on counsel of record via the Court's CM/ECF filing system on this the 12th day of December 2018.

/s/ Christopher Tortorice  
CHRISTOPHER TORTORICE  
Assistant United States Attorney